

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
FILED

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 24-CR-

2024 DEC 17 P 2:40  
24-CR-236  
CLERK OF COURT

v.

[18 U.S.C. §§ 844(h), 844(i), 1343, 1349,  
& 1001(a)]

ARLETTA ALLEN,

Defendant.

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**INDICTMENT**

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**COUNT ONE**  
**(Arson of a Building)**

**THE GRAND JURY CHARGES THAT:**

On or about October 10, 2021, in the State and Eastern District of Wisconsin,

**ARLETTA ALLEN**

did maliciously damage by means of fire, a commercial building used in interstate commerce, a restaurant known as "A Family Affair Soulfood Kitchen," located at 417 S. Main Street, Fond du Lac, Wisconsin.

In violation of Title 18, United States Code, Section 844(i).

**COUNT TWO**  
**(Wire Fraud)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Beginning in approximately October 2021 and continuing through at least December 2021, in the State and Eastern District of Wisconsin and elsewhere,

**ARLETTA ALLEN**

knowingly devised and participated in a scheme to defraud Germantown Mutual Insurance Company (“GMIC”) by means of materially false and fraudulent pretenses and representations.

2. At all times relevant to this Indictment, (a) Allen operated a business called, “A Family Affair Soulfood Kitchen” in a commercial building located at 417 S. Main Street, Fond du Lac, Wisconsin; (b) Allen leased the building from the property owner, R.F.; (c) Allen obtained a commercial property insurance policy from GMIC, which insured the building, its contents, and the business income associated with that address; and (d) the policy provided coverage in the event of a loss caused by fire but excluded coverage for losses caused by any intentional act, design, and procurement by the policy holder.

**The Scheme to Defraud**

3. The essence of the scheme was to intentionally set fire to the building located at 417 S. Main Street, Fond du Lac, Wisconsin, as charged in Count One of this Indictment, and falsely claim that the fire was accidental and did not originate from any act or procurement by Allen, in order to obtain insurance proceeds based on Allen’s materially false and fraudulent claims.

4. In furtherance of the scheme, Allen signed a sworn proof of loss claim, which she submitted to GMIC, in which she falsely represented that the fire “did not originate by any act, design, or procurement by the insured.”

### **Execution of the Scheme to Defraud**

5. On or about December 10, 2021, for the purpose of executing the scheme to defraud and attempting to do so,

#### **ARLETTA ALLEN**

knowingly caused to be transmitted in interstate commerce a wire communication between the Eastern District of Wisconsin and a Federal Reserve Bank located outside the State of Wisconsin, when she co-signed a \$160,000 check, representing insurance proceeds for losses caused by the fire, knowing that it would then be deposited into a bank account at Horicon Bank.

All in violation of Title 18, United States Code, Sections 1343 and 1349.

**COUNT THREE**  
**(Arson to Commit a Federal Felony)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 10, 2021, in the State and Eastern District of Wisconsin,

**ARLETTA ALLEN**

knowingly used fire to commit a felony which may be prosecuted in a court of the United States, namely wire fraud and attempted wire fraud in violation of Title 18, United States Code, Sections 1343 and 1349, as charged in Count Two of this Indictment.

In violation of Title 18, United States Code, Section 844(h).

**COUNT FOUR**  
**(False Statement)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Between on or about October 11, 2021, and October 19, 2021, in a matter within the jurisdiction of the executive branch of the government of the United States,

**ARLETTA ALLEN**

knowingly and willfully made materially false, fictitious, and fraudulent statements.

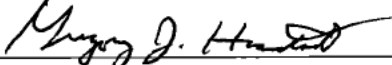
2. Specifically, during the investigation of a fire inside Allen's restaurant, "A Family Affair Soulfood Kitchen," which was jointly investigated by the Wisconsin Department of Justice, Division of Criminal Investigation, and the Bureau of Alcohol, Tobacco, Firearms and Explosives, Allen falsely stated to law enforcement on more than one occasion that she left the restaurant mid-afternoon on October 10, 2021, and remained at her home until she received notification of the fire later that evening. In fact, Allen returned to the restaurant at approximately 8:38 p.m. on October 10, 2021, and remained inside until she departed the restaurant at approximately 8:42 p.m., 17 minutes before another person called 911 to report the fire.

All in violation of Title 18, United States Code, Section 1001(a).

A TRUE BILL:

  
FOREPERSON

Dated: 12/17/2024

  
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GREGORY J. HAANSTAD  
United States Attorney